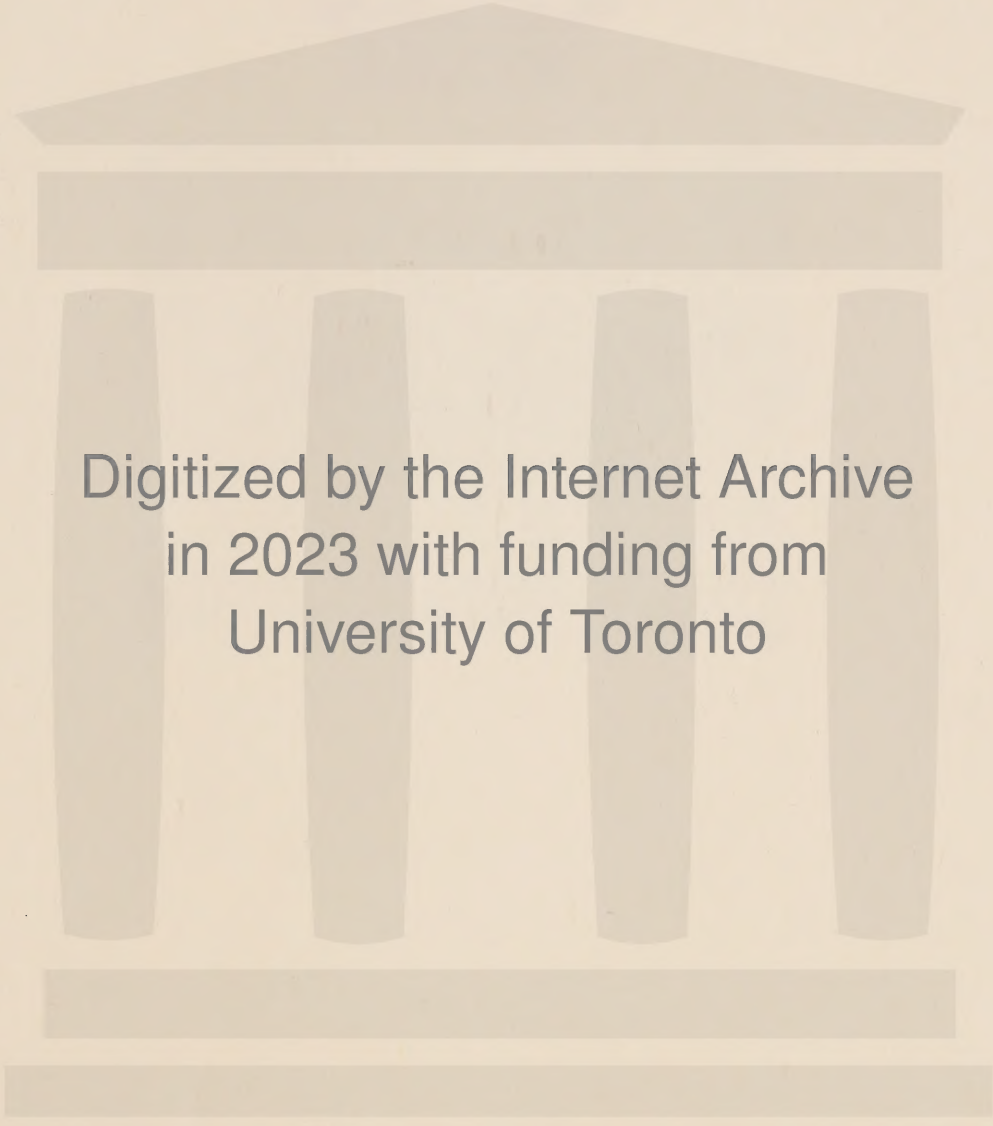

BRIEF ON THE FULL IMPLEMENTATION OF EQUALITY PRESENTED TO THE PARLIAMENTARY SUB-COMMITTEE ON EQUALITY RIGHTS

Canadian Advisory Council on the Status of Women
Conseil consultatif canadien sur la situation de la femme

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Canadian Advisory Council on the Status of Women

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INTRODUCTION

In 1980 and 1981, women from every corner of the country worked extremely hard to ensure that sex equality was enshrined in the Constitution. The purpose and result of this massive activity by Canadian women was the inclusion of section 28 in the *Charter of Rights and Freedoms*.

> 28. Notwithstanding anything in this Charter, the rights and freedoms referred to in it are guaranteed equally to male and female persons.

Section 28 contains the most powerful language of any Charter provision. It strengthens the prohibition of sex-based discrimination in section 15. Section 15, "Equality Rights", guarantees equality before and under the law and the right to the equal protection and equal benefit of the law without discrimination, in particular without discrimination on the basis of certain enumerated grounds, one of which is sex. But section 15 is subject to section 33, which allows Parliament or a provincial legislature to declare that laws will operate notwithstanding section 15 of the Charter. As well, it is subject to section 1, which permits reasonable limits on equality rights if such limits are demonstrably justified in a free and democratic society. Section 28 is much more powerful. "Notwithstanding anything in this Charter" means that sex equality cannot be overridden by a government under section 33, nor can limits be imposed on it under section 1. The principle of equality between women and men has become, through section 28, the Charter's strongest command to governments.

The federal government, on realization of its new obligations as commanded by the Charter, conducted a review of its legislation and programs to ensure compliance with the Charter. The three-year moratorium on equality rights in section 15 had been justified on the basis that governments required time to bring laws and practices into conformity with the Charter. On January 31, 1985, the Minister of Justice introduced Bill C-27 in the House of Commons, *An Act to amend certain Acts having regard to the Canadian Charter of Rights and Freedoms*. The Minister also released a Discussion Paper entitled *Equality Issues in Federal Law* containing an exposition of certain areas which,

in the opinion of the Minister, required public consultation and deliberation before the equality issues could be resolved. Our appearance today is a result of the Minister's call for public hearings.

The Canadian Advisory Council on the Status of Women (CACSW) welcomes the opportunity to respond to the issues raised in the Discussion Paper. Every ground of prohibited discrimination in section 15 is of great significance to women, as indeed are all of the Charter rights and freedoms. But the critical provision is section 28. The focus of our submission today will be on sex equality as now mandated by that section. Our primary concern with the Discussion Paper is its failure to consider seriously section 28, which, as we have noted, is the most powerful provision in the Charter. Section 28 reinforces and strengthens the prohibition on sex-based discrimination in section 15. The application of section 28 would have resolved many, if not all, of the issues raised in the Discussion Paper under the heading "Sex". Taking section 28 into account would also have necessitated a **fuller** examination of discrimination in Canadian laws and practices. Moreover, the principle of equality between the sexes, a principle which the government is now obligated to further, requires for its realization government action that may go beyond the strictly legal dictates of the Charter.

The next section of our submission will criticize the interpretation of section 28 utilized in the Discussion Paper and will advance alternative interpretations that give effect to the strength of section 28. We will then examine Bill C-27 and the Discussion Paper in light of the governmental obligation to alleviate **all** forms of discrimination between women and men. Suggestions will be offered for changes to existing discriminatory legislation. Finally, we will propose further actions that ought to be taken by the government to implement fully the principle of sex equality.

TAKING SECTION 28 SERIOUSLY

The Discussion Paper refers to section 28 on pages 8 and 27. Both comments are to the same effect: that section 28 "makes it very clear that any distinction made on the basis of sex must be examined carefully to determine if they result in adverse consequences which cannot be justified."[1] This view of section 28 is that sex-based inequalities will be permitted unless there are no justifications for the discrimination. It implies that inequality will be the norm, with the person challenging the inequality bearing the burden of proving that the discrimination has no justification.

Such an interpretation of section 28 cannot be correct. Section 28 is much more powerful than section 15. Yet the Discussion Paper's interpretation equates section 28 to only the minimum required by section 15. By itself, section 15 will strike down the use of any prohibited ground of discrimination, including sex, when there is no justification for the discrimination. For example, if a government decided to exclude black persons from the protection of the *Canada Labour Code*, the decision would infringe section 15 because no justification could be presented for the discrimination on the basis of race. It must be emphasized that the impermissibility of non-justifiable discrimination is merely the **minimum** mandate of section 15. In conjunction with section 1, section 15 will also render invalid the use of prohibited distinctions, such as race, age, or sex, when justifications exist but do not outweigh the rights of individuals to equal protection and equal benefit. Moreover, the implicit acceptance of inequality as the norm is **contrary** even to section 15 which declares in its opening words that "every individual is equal before and under the law". The principle and presumption of equality is enunciated by these words; it is inequality which must be justified by the government rather than an individual having the burden of proving that the inequality cannot be justified. Equality as a positive, overriding principle is even more clearly entrenched in section 28.

If the Discussion Paper means what it says, that section 28 only strikes down **non-justified** discrimination on the basis of sex, then the Minister of Justice understands section 28 as doing no more than the minimum required

by section 15. Such a "minimalist" interpretation is at odds with the purpose of section 28 and is clearly inconsistent with the very strong words of section 28. Unfortunately, it appears that the Discussion Paper did mean what it said, for its analysis of sex-based distinctions is no different from its analysis of any other prohibited basis of discrimination. The only conclusion one can draw from the Discussion Paper is that it ignores section 28 altogether.

The Canadian Advisory Council on the Status of Women must express its deep concern about the Discussion Paper's casual dismissal of section 28. Such an interpretation of section 28 is misguided for at least three reasons. First, the prolonged effort of Canadian women to include section 28 in the Charter will not achieve its purpose if the government does not recognize the constitutional commitment to sex equality. Second, the Discussion Paper's "minimalist" interpretation of section 28 is contrary to the intention of the framers of the Constitution. Section 28 was clearly intended to provide **additional** protection for sex equality, not merely to restate the prohibition on sex-based discrimination in section 15. The Supreme Court of Canada has stated in a recent Charter judgement that the intention of the framers is an important if not decisive consideration in the interpretation of Charter provisions.[2] Third, the opening words of section 28 cannot be over-emphasized: **notwithstanding anything in this Charter**. Equality between women and men is, to repeat, the strongest obligation on government, and cannot be equated to the grounds of discrimination contained in section 15, let alone subjected to less stringent standards.

We state repeatedly the importance of section 28 because it merits repetition. The government must not forget or ignore the strongest constitutional obligation.

If the Discussion Paper's interpretation of section 28 is rejected — as it must be — what then is the appropriate interpretation? There are two approaches which take section 28 seriously. The first, which may be called the literal approach because it is based on the purpose and **words** of section 28, is that section 28 prohibits **any** distinction in laws and practices between women and men, except if made for the purposes of an affirmative action program

under section 15(2). The second approach, which may be called strict scrutiny, is the very least required by section 28. Strict scrutiny demands a presumption of equality which can only be displaced by compelling justifications made by the government. The justifications must be so weighty that the government can legitimately say it has no option but to utilize sex-based distinctions. As well, the justifications must not be based on stereotypes of the abilities of men and women, but rather must be proven with empirical data. Once again, different treatment would be permissible for affirmative action programs.

The CACSW is concerned that any interpretation other than the literal one will open the door to legislation or practices which place women in detrimental positions. However, even adopting the strict scrutiny approach would be greatly preferable to the "minimalist" interpretation in the Discussion Paper. Strict scrutiny, as we have stated, is the very least that is required of the government in fulfilment of its constitutional obligation to ensure sex equality. Its application would have resolved the "gray" areas raised in the Discussion Paper,[3] such as the sex-based distinction in the Family Allowance Program,[4] the discrimination against spouses in the *Canada Elections Act*,[5] and the discrimination against women in the Armed Forces.[6] We will discuss several of these areas in the next section.

ELIMINATING THE FORMS OF DISCRIMINATION

Section 28 is designed to achieve sex equality. We realize the complete elimination of sex-based discrimination is a complex and difficult task. The identification and analysis of the causes of sex inequality in a specific area often can be as complicated as the resolution of the problem. However, when sex-based discrimination is viewed from a legal context, it takes one of two forms.

Facial discrimination occurs when a law or regulation expressly creates an extra burden or confers an extra benefit on only one sex. The sex inequality is on the face of the statute or program. An example which affected

our grandmothers was the law which denied women the right to vote in federal elections. Simply reading the words of the statute would reveal the discrimination.

The other form is systemic discrimination, which refers to a facially neutral rule which has an adverse and disproportionate **impact** on a particular group such as women. The example of systemic discrimination given in the Discussion Paper is a law which excludes part-time workers from pension benefits.[7] The law is facially neutral since it does not classify on the basis of sex but instead classifies workers on the basis of hours worked per week. If the majority of part-time workers are women, the law has an adverse and disproportionate impact on women and this impact constitutes systemic discrimination. It is discrimination in the system and operation of the laws rather than on the face of the laws.

Section 28 requires the elimination of both forms of discrimination. Bill C-27 and the Discussion Paper will be analysed to determine what they do — and fail to do — about the eradication of both forms of discrimination.

Facial Discrimination

Bill C-27 proposes to remove facial discrimination from seven federal statutes.[8] Provisions which create a burden or confer a benefit on one sex will be amended to include the other sex. The one-sex terms (such as wife or widow) in these seven statutes will either be replaced by neutral terms (spouse) or will be accompanied by the other-sex equivalent (adding widower). For example, the *Merchant Seamen Compensation Act*, which currently allows compensation to be paid to a widow or an invalid widower of a deceased worker, will be changed to extend compensation to all surviving spouses.

The elimination of facial discrimination in these seven statutes is a necessary step toward sex equality. However, the proposed amendments are insignificant in terms of their social impact and the number of affected persons. Other more important instances of facial discrimination are not removed by

Bill C-27, nor does the Bill or the Discussion Paper deal with the problem of sexist terminology. We will discuss the latter first, then proceed to other areas of facial discrimination.

Bill C-27 and the Discussion Paper fail to address the most flagrant use of sexist language in federal statutes and regulations: the virtually exclusive use of the pronoun "he" and related words such as "his". No change is proposed to the *Interpretation Act*, "Words importing male persons include female persons and corporations."[9] The reverse deeming (that references to female persons include male persons) is not done in this Act. The *Interpretation Act* allows all federal rules to be written in sexist language. To deem the male gender as including the female gender is unacceptable. It is as offensive as laws which used the term "whites" throughout, but then defined "whites" to include "blacks and other races". The drafters of legislation can write women out of existence. Moreover, the exclusive use of male terms raises the likelihood that drafters think only about men when they design programs and policies. It must be noted that one provision of Bill C-27 recognizes the unacceptability of male terms. Section 48(1) repeals the definition of "man" in section 2 of the *National Defence Act*, which refers to any person not an officer enrolled in the Armed Forces (thus deeming all women who were not officers to be men), and replaces it with a definition of "non-commissioned member". However, the recognition is only partial, as even the sexist titles of some statutes, such as the *Merchant Seamen Compensation Act*, are not altered by the Bill.

It may be impracticable to expunge immediately sexist pronouns and terms from every statute and regulation. However, all legislation and regulations in the future could certainly be written in non-sexist language. A requirement of non-sexist words should be explicitly made part of the Charter review process envisaged by section 106 of Bill C-27, which imposes an obligation on the Minister of Justice to ensure that regulations and bills comply with the Charter. The obligation should be given added teeth by amending the *Interpretation Act* to provide that words importing the male person will be deemed **not** to include the female person in any statute or regulation enacted after a certain date, including any amendment to an existing statute or regulation. If the intention of the drafters of laws is to include only women or only men, such

intention should be made explicit. A date clearly appropriate for the beginning of non-sexist language in the drafting of new laws and regulations would be April 17, 1985. For the language of our laws to reflect equality is consonant with the spirit of section 28.

As we noted previously, some important instances of facial discrimination are not amended by Bill C-27. Rather, they are raised in the Discussion Paper as areas of concern under the heading "Sex".[10] If section 28 is taken seriously, which demands at the very least strict scrutiny of any sex-based discrimination, these areas of concern would not be problems. We will apply section 28 to several programs and laws, specifically Family Allowance programs and Unemployment Insurance, as examples of the approach required by the overriding principle of sex equality.

The Family Allowance Program is an instance of facial discrimination which is not addressed by Bill C-27. In two-parent families, subject to limited exceptions, the allowances are paid to the female parent. The Discussion Paper states that "the assumption behind this sex-based distinction appears to be that the female parents are the primary care-givers".

It is perhaps ironic that one of the remaining instances of facial discrimination now subject to challenge under section 28 is a program which has been of benefit to women. The CACSW is a staunch advocate of universal family allowances because of their critical role in Canada's social security system. The program has been the only consistent economic recognition of the contribution of mothers in society. However, its facial discrimination cannot withstand the strict scrutiny required by section 28. The assumption that women are the primary care-givers reinforces the prevalent belief that the role of women is to raise children and that men have no obligation to be active and equal parents. Assumptions about the proper roles of women and men cannot be tolerated in this post-section 28 era.

Notions about the role of women, even when beneficial, cannot be sustained because accepting such notions when they result in an ostensible or real benefit to women lessens the power of section 28. A weak interpretation of section 28 will make it easier for governments in the future to implement detrimental assumptions about women.

One reason the CACSW has supported universal family allowances is that they are in many cases the only independent source of income for women working full-time in the home. A revised program could still achieve this objective if the family allowance was payable to the parent that does not work outside the home. The homemaker-parent, besides benefitting from an income not dependent on the wage-earner, would also almost invariably be the primary care-giver with respect to the children. When both parents are wage-earners, family allowances could be payable to the lower income-earner. The lower income-earner, typically the female parent (because women still receive far less pay for their waged work than men do), will benefit from the additional source of income.

Another instance of facial discrimination is maternity benefits available under the *Unemployment Insurance Act*. Of course, only women are capable of pregnancy and childbirth. However, maternity benefits, as they are presently established, provide benefits not only during pregnancy and childbirth, but also during the time immediately after the birth in order to allow the mother to care for the child. Unlike adoption benefits, which are available to either parent, the child-care component of maternity benefits is available only to the female parent. Male parents who would like to stay at home and care for a new-born child are unable to obtain benefits under the current scheme.

The underlying assumption behind the child-care portion of maternity benefits is once again that women are the primary or even sole care-givers for children and that men have no obligation to be active and equal parents. Such stereotypes are unacceptable. The unemployment insurance system should be changed to allow either parent the opportunity to care for the new-born child.

Several options are available to provide for equal participation in the care of infants. One possibility for reform is the CACSW's recommendation that maternity benefits be replaced by fully paid parental benefits of twenty-six weeks in duration. The parental benefits could be taken by either parent according to their own needs and choices. For example, the female parent could obtain benefits during the period of late pregnancy and childbirth, and the remaining weeks could be taken equally by both parents or the male parent could obtain parental benefits for the entire child-care period, the total benefits not to exceed twenty-six weeks. Such a system would not only give parents flexibility in their arrangements, but it would not be tied to stereotyped assumptions about the proper "role" of women and men in the family. The extension of benefits to twenty-six weeks would reflect a commitment to supporting all members of the family in their child-care needs, at least with respect to newborn children.

We could continue with an analysis of other areas mentioned in the Discussion Paper under the heading "Sex". However, these two examples illustrate our point: that it is possible to redesign legislation without facial discrimination and without using stereotypes about the roles of women and men. The principle of sex equality in section 28 demands no less.

Systemic Discrimination

Systemic discrimination is a much more critical problem than facial discrimination. It is also a more difficult problem to correct through legal or other means because of its pervasiveness throughout laws and programs. Even to identify systemic discrimination can be a complex task because its discovery involves an analysis of the **impact** of laws on women. Often, systemic discrimination results from the inadequate scope of laws or programs; that is, these laws and programs are not broad enough to result in an impact which is non-discriminatory. The exclusion from the Canada Pension Plan of workers making less than $2,300 per year (1985), most of whom are women working part-time, is one example of how systemic discrimination against women is caused by the

narrow cast of laws. One must look at what laws and programs **do** and what they **do not** do if systemic discrimination is to be eliminated.

Canada has an international obligation to remove systemic discrimination. Article 2 of the *Convention on the Elimination of All Forms of Discrimination Against Women* reads in part:

> State Parties condemn discrimination against women **in all its forms,** agree to pursue by all appropriate means and without delay a policy of eliminating discrimination against women and, to this end, undertake . . .
>
> (emphasis added)

In its May 1983 report to the United Nations, Canada acknowledged its obligation to eliminate systemic discrimination:

> Article 2 of the Convention requires the prohibition of *de facto* discrimination as well as discrimination *per se*. Thus, adverse treatment based on sex-linked characteristics such as height or pregnancy are prohibited. Adverse treatment on the basis of sex itself, or **conduct which has an adverse impact predominantly on women is prohibited even if adverse treatment or effect is not the primary purpose of the conduct.**[11] (emphasis added)

It would be tragic for Canadian women if systemic discrimination was not addressed by the government in a comprehensive manner. Now that women have achieved the right not to be expressly barred from the wording of laws, we cannot be kept in an unequal position by neutral words with disastrous impact.

The CACSW believes that section 28 compels the eradication of systemic discrimination in Canadian society. First, it is today the most pervasive form of discrimination, as women are seldom now **expressly** excluded by the wording of laws. The relatively small number of statutes which still contain facial discrimination is evidence that sex inequality is perpetuated in the 1980s by systemic discrimination. Second, this type of discrimination typically has the gravest economic ramifications for women as a group. The Discussion Paper's own example, the exclusion of part-time workers from pension benefits, illus-

trates the gravity of the consequences. The desperate financial plight of a majority of elderly single women is in part a result of systemic discrimination in pension laws. Third, a matter of principle is at stake. Systemic discrimination too often occurs because laws and policies are designed from the male point of view, using men as the standard. Height and weight requirements for fire fighters are the classic example. Their application typically includes most men and excludes most women because men are taken as the norm in creating the requirements in the first place. Sex equality demands designing policies with non-sexist standards that bring an awareness of the impact of both sexes into the rules.

The CACSW is concerned about the cautious approach to systemic discrimination taken in the Discussion Paper, as revealed by the statement that section 15 "**might** be applied to systemic discrimination".[12] (emphasis added). From a legal perspective, the phrase "equal benefit" in section 15(1) connotes an emphasis on the effect or impact of a law. How can one decide if two persons or two groups have received the equal benefit of a law unless there is a scrutiny of the **effects** of the law on each one? Also, section 15(2) requires an examination of the conditions of disadvantaged individuals. It would be inconsistent if the adverse consequences that occurred previously could be considered for the purposes of creating an affirmative action program, but present and future adverse consequences could be ignored in designing new legislation. Section 28, with a stronger principle of sex equality than section 15, must also compel the elimination of systemic discrimination.

The only instance of systemic discrimination raised as a matter of concern in the Discussion Paper under the heading "Sex" is a provision of the *Canada Elections Act*. This statute deems spouses of armed forces electors to hold the same residence as the elector. The great majority of these spouses are women, who are denied the opportunity to choose a place of residence for voting purposes. Although the removal of this specific manifestation of systemic discrimination would be a necessary step toward sex equality, there are many other instances of systemic discrimination which are vastly more significant to many more women, yet are not addressed by the Discussion Paper or Bill C-27.

An example is the legal regime governing pensions. Besides the facial discrimination of sex-based mortality tables, which is raised in the Discussion Paper on pages 34 and 35 (and which we suggest should be eliminated as soon as possible by a statutory requirement of unisex mortality tables), many aspects of pension laws constitute systemic discrimination against women. We will mention two instances in the Canada Pension Plan. First, homemakers are excluded from the Canada Pension Plan. The overwhelming majority of homemakers are women. Their exclusion is based on an unquestioned acceptance of the dependency of married women on their husbands, who are expected to support them, and on an assumption about the lack of pensionable value for work done in the home. Second, workers at the lowest end of the pay scale, the majority of whom are women working part-time, are also excluded from the Canada Pension Plan. The Canada Pension Plan, designed from the point of view of male workers earning wages from full-time employment, does not adequately take account of the paid and unpaid work experiences of women. Combined with other discriminatory features of the Canada Pension Plan and private pension plans, these problems condemn most elderly women to a life of poverty.

Time and space have precluded herein an analysis of all instances of systemic discrimination against women. The Canadian Advisory Council on the Status of Women, since its inception, has sponsored and published research analysing systemic discrimination in pension laws, income taxation, labour laws, and a variety of other areas. Many other women's organizations have devoted tremendous energy to examining systemic discrimination. The most recent example is the *Report on the Statute Audit Project* by the Charter of Rights Educational Fund, released in January 1985, which focusses on systemic discrimination against women. The information is available to begin the implementation of the constitutional and international commitment to sex equality. The time for review and deliberation is past; section 28 demands action.

THE FULL IMPLEMENTATION OF EQUALITY

Sex inequality permeates and pervades virtually every facet of Canadian society. We realize the elimination of inequality cannot be achieved solely through government laws and programs. But legislation and other governmental action can go a long way toward the attainment of sex equality. The government has the power to ameliorate many aspects of existing inequalities. It has an international commitment to eliminate all forms of discrimination against women. Now it has also a constitutional obligation, by virtue of section 28 of the Charter, to further the principle of sex equality.

We cannot accept that the problems of existing discriminatory laws and programs must be left solely to the courts for resolution, through costly litigation that challenges such discrimination under both section 15 and section 28. The government is bound by the dictates of the Charter, and has a positive obligation and duty to eliminate sex-based discrimination. Initiatives which seek to achieve sex equality must and should originate from the government. A government, if it takes its constitutional obligation seriously, will not wait to change laws until a court orders it to do so.

We have outlined several actions the government should adopt to fulfil its constitutional obligation regarding sex equality. First, section 28 demands a removal of sexist language. Second, it demands the elimination of facially discriminatory laws and programs. We have suggested possible changes to the Family Allowance Program and maternity benefits under the Unemployment Insurance scheme. These two areas serve as examples of the changes constitutionally required by section 28. Third, section 28 demands a redesign of laws which allow and even reinforce systemic discrimination. We have given pension plans, specifically the Canada Pension Plan, as an example of systemic discrimination which urgently needs correction. True equality of women and men can only be attained by the elimination of systemic discrimination. The removal of facial discrimination alone is insufficient. We cannot overemphasize the critical importance of the government beginning, through its laws, to make a major contribution to the removal of systemic discrimination.

These measures, particularly the elimination of systemic discrimination, will go a long way toward the attainment of sex equality. However, the full implementation of equality requires government initiatives that may go beyond its constitutional obligation under section 28. Affirmative action programs in employment, although perhaps not strictly required by the Charter, are clearly necessary as a significant step toward sex equality. Without affirmative action programs, women will continue to be consigned for a very long time to low-paid employment. Affirmative action programs must be coupled with the efficacious application of the principle of equal pay for work of equal value. Both are necessary to ensure the full and equal employment of women. We urge the government to implement affirmative action immediately. The promise and hope of section 28 demands no less for its realization.

NOTES

1. Canada, Justice Canada, *Equality Issues in Federal Law*, Discussion Paper (Ottawa: 1985), p. 27.

2. See: *Quebec Association of Protestant School Boards v. A.G. of Quebec* (1984), 10 D.L.R. (4th) 321.

3. Canada, Justice Canada, *Equality Issues in Federal Law*, Discussion Paper (Ottawa: 1985), pp. 27-36.

4. *Ibid.*, p. 33.

5. *Ibid.*

6. *Ibid.*, pp. 29-33.

7. *Ibid.*, p. 9.

8. *Army Benevolent Fund Act*, *Bankruptcy Act*, *Merchant Seamen Compensation Act*, *National Defence Act*, *Returned Soldiers' Insurance Act*, *Canada Shipping Act*, *Veterans Rehabilitation Act*.

9. *Interpretation Act*, R.S.C. 1970, c. I-23, s. 26(6).

10. Canada, Justice Canada, *Equality Issues in Federal Law*, Discussion Paper (Ottawa: 1985), pp. 27-36.

11. Canada, *Report of Canada, Convention on the Elimination of All Forms of Discrimination Against Women*, May 1983, p. 3.

12. Canada, Justice Canada, *Equality Issues in Federal Law*, Discussion Paper (Ottawa: 1985), p. 9.

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